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**From:** Caballero, Kathryn [Caballero.Kathryn@epa.gov]  
**Sent:** 10/5/2018 7:47:45 PM  
**To:** Williams, Christopher [Williams.Christopher@epa.gov]  
**Subject:** FW: Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD  
**Attachments:** PIGGING 2018.pdf

Wow – this is great! Is this ZVAC technology a new addition for the enforcement alert?

Kathryn Pirrotta Caballero  
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Air Enforcement Division  
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**From:** Rimkus, Christopher L. [mailto:christopher.rimkus@markwest.com]  
**Sent:** Tuesday, October 02, 2018 10:55 AM  
**To:** Williams, Christopher <Williams.Christopher@epa.gov>  
**Cc:** Elmer, Mark (ENRD) <Mark.Elmer@usdoj.gov>; Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Snyder, Doug <Snyder.Doug@epa.gov>; McAuliffe, Mary <mcauliffe.mary@epa.gov>; Mike Heilman <mheilman@pa.gov>; Don J. Patterson (DPatterson@bdlaw.com) <DPatterson@bdlaw.com>; Mchale, Robert E. <robert.mchale@markwest.com>; Crowe, Bryan A. <bryan.crowe@markwest.com>; Lush, Edward R. <edward.lush@markwest.com>  
**Subject:** RE: Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD

Thank you for your consideration of the same.

If possible, I'd like to discuss the attached with you. It should not take long and I think it bears attention now rather than waiting for 2019. I promise to have a technical person on the line (I have cc'd Robert McHale and Bryan Crowe on this email as the suggested technical people, although all their fancy degrees and experience really can't beat good prose).

In particular, you will note on the ZVAC slides that as part of our efforts to eliminate pig L/R emissions, we have been working with a vendor to find a way to better depressurize the barrels and minimize venting. We have a design that seems to be working in field testing we have been performing. Bryan and Rob can do a much better job than I in describing its mechanics, but the gist of it is that it uses a bladder to force gas in the barrel on down the line effectively leaving zero gas in the barrel when it is vented.

This could represent a very important development for minimizing field L/R emissions. In addition to the items we've already agreed upon, I'd like to identify it for third parties as another option they can consider for the their operations in order to reduce emissions. It doesn't require a change in the CD- I just want to make sure you would be ok with us including it in our design enhancements as part of our trainings.

Please advise if you all could make time- a half hour or so- to discuss the ZVAC at your convenience. I hope this finds you and everyone on the chain well. Thanks,

Chris

Christopher Rimkus  
Assistant General Counsel - MarkWest  
1515 Arapahoe, Suite 1600  
Denver, CO 80202  
303-925-9205 (o)  
832-651-0153 (c)

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**From:** Williams, Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>  
**Sent:** Monday, October 01, 2018 12:00 PM  
**To:** Rimkus, Christopher L. <[christopher.rimkus@markwest.com](mailto:christopher.rimkus@markwest.com)>  
**Cc:** Elmer, Mark (ENRD) <[Mark.Elmer@usdoj.gov](mailto:Mark.Elmer@usdoj.gov)>; Caballero, Kathryn <[Caballero.Kathryn@epa.gov](mailto:Caballero.Kathryn@epa.gov)>; Snyder, Doug <[Snyder.Doug@epa.gov](mailto:Snyder.Doug@epa.gov)>; McAuliffe, Mary <[mcauliffe.mary@epa.gov](mailto:mcauliffe.mary@epa.gov)>; Mike Heilman <[mheilman@pa.gov](mailto:mheilman@pa.gov)>; Don J. Patterson <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)> <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)>  
**Subject:** [EXTERNAL] RE: Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD

Thank you, Chris, for your request. We have discussed it internally and after some consideration believe that it is too premature to provide you with a response. In review of the language of the Consent Decree (Paragraph 28a), it is clear that technical staff is to be available in-person at the presentations to perform demonstrations and appropriately engage in technical discussions. Without having had time to review some of the presented material which is to be made public pursuant to Paragraph 28a, and without sufficient time to gauge the success of the SEP, we find it difficult to provide an appropriate response at this time. Therefore, we ask to revisit this request after a year or so when we have the information we feel is necessary to adequately respond.

Thanks,

Chris

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**From:** Rimkus, Christopher L. [<mailto:christopher.rimkus@markwest.com>]  
**Sent:** Thursday, September 27, 2018 10:21 AM  
**To:** Williams, Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>  
**Cc:** 'Elmer, Mark (ENRD)' <[Mark.Elmer@usdoj.gov](mailto:Mark.Elmer@usdoj.gov)>; Caballero, Kathryn <[Caballero.Kathryn@epa.gov](mailto:Caballero.Kathryn@epa.gov)>; Snyder, Doug <[Snyder.Doug@epa.gov](mailto:Snyder.Doug@epa.gov)>; McAuliffe, Mary <[mcauliffe.mary@epa.gov](mailto:mcauliffe.mary@epa.gov)>; 'Mike Heilman' <[mheilman@pa.gov](mailto:mheilman@pa.gov)>; Don J. Patterson <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)> <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)>  
**Subject:** RE: Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD

Just wanted to follow-up on the presentation piece. I would like to be able to capture all of the presentations were are doing that touch upon the L/R improvements. Please advise at your convenience. Bets wishes,

Chris

Christopher Rimkus  
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**From:** Rimkus, Christopher L.  
**Sent:** Thursday, September 20, 2018 10:16 AM  
**To:** Williams, Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>  
**Cc:** Elmer, Mark (ENRD) <[Mark.Elmer@usdoj.gov](mailto:Mark.Elmer@usdoj.gov)>; Caballero, Kathryn <[Caballero.Kathryn@epa.gov](mailto:Caballero.Kathryn@epa.gov)>; Snyder, Doug <[Snyder.Doug@epa.gov](mailto:Snyder.Doug@epa.gov)>; McAuliffe, Mary <[mcauliffe.mary@epa.gov](mailto:mcauliffe.mary@epa.gov)>; Mike Heilman <[mheilman@pa.gov](mailto:mheilman@pa.gov)>; Don J. Patterson <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)> <[DPatterson@bdlaw.com](mailto:DPatterson@bdlaw.com)>  
**Subject:** RE: Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD

Excellent. Thanks Chris.

Mark/Kathryn/Chris- Also, we are participating in various trade groups and sharing the pig ramp designs, as well as the HP to LP jumpers. In most cases, one of our smart technical folks attend. However, at some legal conferences in which I have spoken or will speak, it is just me. These conferences can be valuable conduits to share our lessons learned with other in-house legal departments. I was wondering if we can get credit for them under the decree even though a technical person is not in attendance, as the decree specifies.

I know, your first reaction is to exclaim "What? I thought you were a technical person, Chris." I get that a lot. But in truth, I am only a lawyer. Is there a way to perhaps vet a presentation and we all stack hands that I could present the same and satisfy the purpose of the decree, which is to disseminate our lessons learned to as wide an influential audience as possible? Let me know at your convenience. Thanks,

Chris

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**From:** Williams, Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>  
**Sent:** Thursday, September 20, 2018 10:07 AM  
**To:** Rimkus, Christopher L. <[christopher.rimkus@markwest.com](mailto:christopher.rimkus@markwest.com)>  
**Cc:** Elmer, Mark (ENRD) <[Mark.Elmer@usdoj.gov](mailto:Mark.Elmer@usdoj.gov)>; Caballero, Kathryn <[Caballero.Kathryn@epa.gov](mailto:Caballero.Kathryn@epa.gov)>; Snyder, Doug <[Snyder.Doug@epa.gov](mailto:Snyder.Doug@epa.gov)>; McAuliffe, Mary <[mcauliffe.mary@epa.gov](mailto:mcauliffe.mary@epa.gov)>; Mike Heilman <[mheilman@pa.gov](mailto:mheilman@pa.gov)>  
**Subject:** [EXTERNAL] Approval of MW Request to EPA re: Pig Launcher/Receiver Third Party Auditor for USA and PA v. MarkWest CD

September 20, 2018

Dear Chris,

The United States Environmental Protection Agency (USEPA), in consultation with Pennsylvania Department of Environmental Protection (PADEP), approves MarkWest Liberty Midstream & Resources, L.L.C and Ohio Gathering Company L.L.C.'s (MarkWest) request (Request for Approval of Third Party Auditor dated September 6, 2018) to use Sonoma Technologies, Inc. for the purpose of Third-Party Audits at MarkWest launcher/receiver sites in Pennsylvania and Ohio pursuant to Section X, paragraphs 49 and 50 of the Consent Decree of *United States of America, and the Commonwealth of v. MarkWest Liberty Midstream & Resources, L.L.C and Ohio Gathering Company L.L.C.* (Civil Action No. 2:18-cv-00520-LPL), effective July 10, 2018.

Feel free to contact me, if you have any other questions or requests regarding this matter.

Sincerely,

Chris

Christopher Williams, P.E.  
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